

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Jeff Pokorny, Larry Blenn, and Kenneth
Busiere, on behalf of themselves and those
similarly situated,

Plaintiffs,

v.

Quixtar, Inc., James Ron Puryear Jr., Georgia
Lee Puryear, and World Wide Group, L.L.C.,
Britt Worldwide L.L.C., American Multimedia
Inc., Britt Management, Inc., Bill Britt and
Peggy Britt,

Defendants.

CASE NO. C 07-0201 SC

**DECLARATION OF STUART H.
SINGER, ATTORNEY FOR
PLAINTIFFS**

I, Stuart H. Singer, do hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of Florida and admitted *pro hac vice* in this matter.

2. I am a partner with the law firm of Boies, Schiller, and Flexner, LLP, attorneys of record herein for the Plaintiffs. I am one of the lead counsel for Plaintiffs.

3. The matters stated herein are based on my personal knowledge and, if called upon to testify, I could and would testify competently thereto:

4. The Settlement Agreement attached as an exhibit to the Joint Motion for Preliminary Approval of Class Action Settlement Agreement and Finding of Good Faith Settlement is a true and correct copy of the settlement agreement that the parties have reached and executed in this matter. All exhibits attached to the Settlement Agreement are true and correct copies of the documents agreed to by the parties as part of the settlement.

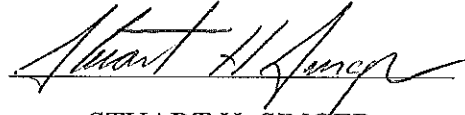
5. The Settlement Agreement was reached after extensive, arms-length negotiations conducted under the supervision of retired Judge Daniel Weinstein. Those negotiations took place over the course of two years and involved over ten face-to-face

BOIES, SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

1 meetings in California and New York, and numerous telephone conferences among counsel,
2 among the mediator and counsel, and among the mediator's staff and counsel. The named
3 plaintiffs attended and participated in many of the mediation sessions. The mediation process
4 included a detailed discussion of claims, the exchange of requested information that normally
5 would not occur until formal discovery, the establishment of a framework for types of
6 injunctive and monetary relief that were to be provided, and finally, after intense negotiation, a
7 proposed settlement agreement.

8 FURTHER DECLARANT SAYETH NOT.

9 I declare under penalty of perjury under the laws of the United States that the foregoing
10 is true and correct and that I executed this declaration on November 2, 2010 in Miami, Florida.

11
12 
13

14 STUART H. SINGER
15
16
17
18
19
20
21
22
23
24
25
26
27
28